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17 Attorneys for Plaintiff ARIELLE LORRE, an individual  
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1                   **TO THE COURT AND DEFENDANTS THEECOMFY LLC AND**  
2 **VICTOR CARRERAS GONZALEZ:**

3                   Plaintiff ARIELLE LORRE (“Plaintiff”), by and through her counsel, hereby  
4 responds to the Court’s Order to Show Cause Re: Dismissal for Lack of Prosecution  
5 issued on September 10, 2025 (Dkt. #16), in which the Court ordered Plaintiff to show  
6 cause, in writing, on or before September 19, 2025, why this action should not be  
7 dismissed for lack of prosecution.

8                   Plaintiff respectfully submits that this action should not be dismissed for lack of  
9 prosecution for the following reasons:

- 10                  1. Plaintiff obtained entry of default against Defendants THEECOMFY LLC and  
11                   VICTOR CARRERAS GONZALEZ pursuant to Federal Rule of Civil  
12                   Procedure 55(a) on August 6, 2025 (Dkts. 14 and 15). The delay in seeking  
13                   default judgment pursuant to Rule 55(b) was due to the need to prepare  
14                   comprehensive documentation, including declarations and evidence of damages,  
15                   to support the motion.
- 16                  2. Plaintiff has diligently pursued this matter and has been actively preparing a  
17                   Motion for Default Judgment and Permanent Injunction against both  
18                   Defendants. That motion, including supporting declarations and a proposed  
19                   order, is being finalized and will be filed concurrently herewith as Dkt. 17),  
20                   prior to the expiration of the deadline set forth in this Order to Show Cause.  
21                   The hearing on said motion is on October 20, 2025 at 1:30 p.m.
- 22                  3. The delay in filing the motion for default judgment does not reflect a lack of  
23                   prosecution but rather an effort to ensure that the motion is thoroughly  
24                   supported to meet the Court’s requirements under Local Rule 55-1 and 55-2.
- 25                  4. Plaintiff remains committed to prosecuting this action and requests that the  
26                   Court allow the filing of the forthcoming Motion for Default Judgment to  
27                   satisfy the Order to Show Cause. Said motion will address all claims against

1 Defendants, including misappropriation of Plaintiff's name and likeness and  
2 violations of California's Unfair Competition Law, and seek appropriate relief.

3 WHEREFORE, Plaintiff respectfully requests that the Court find good cause to  
4 refrain from dismissing this action for lack of prosecution, discharge the order to show  
5 cause, and enter default judgment against both Defendants pursuant to the Motion for  
Default Judgment.

6  
7 DATED: September 18, 2025 LAW OFFICES OF RONALD RICHARDS AND  
ASSOCIATES, A.P.C.  
8

9 By: /s/ Ronald Richards  
10 Ronald Richards, Esq.  
11 Attorneys for Plaintiff Arielle Lorre

12 DATED: September 18, 2025 LAW OFFICES OF GEOFFREY LONG, A.P.C.  
13

14 By: /s/ Geoffrey Long  
15 Geoffrey Long, Esq.  
16 Attorneys for Plaintiff Arielle Lorre  
17  
18  
19  
20  
21  
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23  
24

1 **CERTIFICATE OF SERVICE**

2 I am employed in the County of Los Angeles, State of California; I am over the  
3 age of 18 and not a party to the within action; my business address is P.O. Box 11480  
Beverly Hills, CA 90213.

4 On the date indicated below, I served the foregoing document(s) described as:

5 **PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE RE: DISMISSAL**  
6 **FOR LACK OF PROSECUTION (DKT. #16)**

7 on the interested parties to this action by delivering a copy thereof in a sealed envelope  
8 addressed to each of said interested parties at the following address(es):

9 Theecomfy LLC  
10 2201 Menaul Blvd. NE, Ste. A  
Albuquerque, NM 87107

11 Victor Carreras Gonzalez  
12 2201 Menaul Blvd. NE, Ste. A  
Albuquerque, NM 87107

13 **X (BY MAIL)** I am readily familiar with the business practice for collection and  
14 processing of correspondence for mailing with the United States Postal Service. This  
15 correspondence shall be deposited with the United States Postal Service this same day in  
the ordinary course of business at our Firm's office address in Los Angeles, California.  
16 Service made pursuant to this paragraph, upon motion of a party served, shall be  
17 presumed invalid if the postal cancellation date of postage meter date on the envelope is  
more than one day after the date of deposit for mailing contained in this affidavit.

18  
19 I declare that I am employed in the office of a member of the bar of this court at  
20 whose direction the service was made. I declare under penalty of perjury that the above  
21 is true and correct. Executed on September 18, 2025, in Los Angeles, CA

22 /s/ Ronald Richards

23 

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RONALD RICHARDS